

CLARK HILL, PLC

Hearing Date: November 15, 2018 at 10:00 a.m.

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*Attorneys for Agree Limited Partnership, Lakewood Shopping
Center, LLC, Crossroads Centre II, LLC, and Ramco Jackson Crossing SPE, LLC*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

_____	x	
	.	Chapter 11
	.	
In re:	.	Case No. 18-23538-rdd
	.	(Jointly Administered)
SEARS HOLDINGS CORPORATION.,	.	
<i>et al.</i> ,	.	Docket # 429
Debtors.	.	
	.	
_____	x	

**JOINDER OF AGREE LIMITED PARTNERSHIP, LAKEWOOD
SHOPPING CENTER, LLC, CROSSROADS CENTRE II, LLC, AND
RAMCO JACKSON CROSSING SPE, LLC IN VARIOUS LIMITED OBJECTIONS TO (I)
DEBTORS' MOTION APPROVAL GLOBAL BIDDING PROCEDURES AND (II) FOR
ENTRY OF AN ORDER AUTHORIZING AND ESTABLISHING PROCEDURES FOR
DE MINIMIS ASSET SALES AND DE MINIMIS ASSET ABANDONMENTS**

Agree Limited Partnership, Lakewood Shopping Center, LLC, Crossroads Centre II, LLC, and Ramco Jackson Crossing SPE, LLC for the leased premises listed on Exhibit "A" ("Landlords"), hereby join in the Limited Objections filed by those certain landlords, which filed the limited objection docketed as Docket #613, 617, 623, 627, 628, and 639 and any other landlord's similar objection (the "***Global Objections***"), as to the Debtors' Motion for Approval of Global Bidding Procedures [Docket #429] and Docket #600, 615, 623, and 627 and any other landlord's similar objection (the "***De Minimis Objections***") as to Motion of Debtors for Entry of an Order Authorizing and Establishing Procedures for De Minimis Asset Sales and De Minimis

Abandonments [Docket #427], for the reasons stated in the filed Global Objections and filed De Minimis Objections.

WHEREFORE, the Landlords request that the Court enter an order: (i) sustaining this Joinder, (ii) denying the relief requested in the Motion unless it is modified as set forth in the filed Global Objections and De Minimis Objection; and (iii) granting such other and further relief as this Court deems just and proper under the circumstances.

Respectfully submitted,

CLARK HILL PLC

Date: November 12, 2018

By: /s/ David M. Blau
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Lakewood Shopping Center, LLC,
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Jackson Crossing SPE, LLC*

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on November 12, 2018, he caused a true and correct copy of the foregoing Joinder to be served electronically and by email upon all those identified in the Master Service List as of November 5, 2018 in accordance with this Court's Order Implementing Certain Notice and Case Management Procedures (the "Case Management Order") entered on October 17, 2018 (Docket No. 139). I hereby further certify that pursuant to the Case Management Order and the local rules, hard copies of the foregoing Limited Objection were delivered via overnight mail to (i) the Honorable Robert D. Drain, and (ii) the United States Trustee's Office

/s/ David M. Blau
David M. Blau

EXHIBIT “A”

Agree Limited Partnership – Kmart - Grayling, MI

Lakewood Shopping Center, LLC – Kmart – Belleville, MI

Crossroads Centre II, LLC – Sears Outlet – Portage, MI

Ramco Jackson Crossing SPE, LLC – Sears – Jackson, MI